

April 8, 2009

Ms. Laura E. Sinram
Senior Campaign Finance Analyst
Federal Election Commission
999 E Street NW
Washington, DC 20463

Re: Ohio Republican Party State Central & Executive Committee

Identification Number: C00162339

Dear Laura:

This correspondence is in response to your audit letter dated March 11, 2009, concerning the above referenced party requiring a response by April 10, 2009. Your report pertains to an Amended 30 Day Post-General Report (October 16, 2008 through November 24, 2008), received December 18, 2008. This correspondence, along with the associated amendments referred to herein, should constitute a complete response to your issues. In the event you need further clarification, please do not hesitate to contact us.

1. You questioned transfers we reported as received from the National Republican Congressional Committee which you were unable to locate on their report. Please be advised we are amending our report to correct the transfer received 10-22-2008 from the Kentucky Republican Party not the National Republican Congressional Committee. A second on 10-27-08 was correctly reported received from the National Republican Congressional Committee. I assume, without further detail from you, these are the two transactions in question.

2. You highlighted two contributors who may have exceeded the contribution limits as set forth pursuant to Act. 2 U.S.C. Sec. 441a(f) and 11 CFR Sec. 110.1(c). Please be advised we have amended our report to reflect amounts contributed by Suzanne Tomsich as \$9,780.00 on 09/08/08 and \$220.00 on 10/22/08. The 09/08/08 contribution was incorrectly originally reported as \$10,000.

A \$10,000 contribution received on 10/24/08 from George Strike was inadvertently reported twice. The report has been amended to correct and delete the duplicate. There were no contributions in excess of limits requiring a refund or reattribution of any amounts.

3. You highlighted several contributors who may have exceeded the contribution limits as set forth in the Act. 2 U.S.C. Sec. 441a(f) and 11 CFR Sec. 110.1(d). Please be advised the contribution received on 11/14/08 from Wellpoint, Inc. WellPAC was for the Steve Stivers for Congress recount. CFR Sec. 100.91 states that " deposit of money...with respect to a recount of the results of a Federal election is not a contribution " Therefore, we do not feel this contributor was over the limit and, as a result, no change to our report is required.

A refund will be issued in the amount of \$2,500 to HBI-PAC, Huntington Bancshares Incorporated Political Action Committee (C00165589). We will forward a copy of the check to the Commission as well as report the expenditure on the appropriate report.

4. We have amended our report as requested to describe the receipts totaling \$1,691.25 from the State of Ohio to the State of Ohio Tax Check Off fund.

5. You requested our report be amended to report correct aggregate year-to-date totals for several individuals you

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believe to be incorrect. Please be advised that our report has been corrected to reflect the appropriate year-to-date totals.

6. You have requested full disclosure of the identification of all individual contributors. Please be advised we have reported all of the information we have received on each donor. A substantial effort is made to capture all of the required information for each contributor, as evidenced by our best efforts procedures outlined in the letter we submitted to you earlier this year. As such, we do not have any additional information to provide so we feel no amendment is necessary at this time.

7. Reference our response in Number 6 above. If additional information becomes available, we will amend our reports accordingly.

8. We amended our report, per your request, to indicate "transfer" on Schedule A supporting Line 11(c) for the receipts from "Chabot for Congress," "Committee for Dewey Stokes," "Friends of John Boehner," "Hobson for Congress," "Jim Jordan for Congress," "Latta for Congress," "Pryce for Congress," "Regula for Congress Committee," "Steve Austria for Congress," and "Tiberi for Congress."

9. We have amended our report, at your request, to more completely describe the four PAC's you have identified.

10. We amended Schedule A supporting Line 12 of our report to reflect the donor receipt from "McCain-Palin Victory 2008," rather than "McCain Victory 2008."

11. You asked for clarification of the nature of the transfer in from the Republican National Committee reported on Schedule A supporting Line 12. Additionally, you are requesting clarification for subsequent payments reported on Schedule B supporting Line 30(b) described as "200,000 door hangers," "collateral t-shirts," "collateral yard signs," etc. As you suggested, we sought further guidance by reference to 11 CFR Sec. 100.87 and Sec. 100.147 and the Campaign Guide for Party Committees.

The two events you identified are completely unrelated. The transfer from the Republican National Committee reported on Schedule A Line 12 is simply funds received and not specifically designated towards a particular expenditure. The expenses reported on Schedule B Line 30(b) for "200,000 door hangers," "collateral t-shirts," "collateral yard signs," etc. were actually paid from Home Grown Funds. As such, we believe the activity does meet the definition of "exempt" activity and the expenditures were not made on behalf of any specifically identified candidates that require disclosure. Therefore, we do not believe any correction or amendment to the report is necessary as a result of this inquiry.

12. You indicate that expenditures and disbursements for public communications that refer to a clearly identified candidate for federal office and that promote, support, attack or oppose any candidate for federal office meet the definition of Federal Election Activity under 11 CFR Sec. 100.24 and require disclosure on Schedule B Line 30(b) along with the identity of the candidate. These expenditures do not meet the definition of Federal Election Activity or contain express advocacy for a particular candidate such that they would require amendment of the report. The expenses were for generic political activities and did not list any specific activity or candidate.

13. Memo entries correspond with our credit card payments and expense report reimbursements. The expenditure to Fifth Third Bank Mastercard was an overpayment, so the Memo entries will not tie out the payment. We do not feel the report requires amending to be responsive to your inquiry.

14. You requested an amendment to Schedule B to clarify the description originally reported as "victory consulting," "victory deployment" and "Production for GOTV 2." You referred us to 11 CFR Sec. 104.3(b)(3). In review of the applicable Code section, we do not feel that these expense are adequately described by the referenced descriptions in this particular section namely, "dinner expenses, media, salary, polling, travel, party fees, phone banks, travel

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expenses, travel expense reimbursement or catering costs." Therefore, we believe that the description as originally provided is the only way to elaborate the activity which was performed, which is consulting, and, therefore, no amendment is necessary.

15. You assumed the payment to Lincoln Strategy Group, LLC to deploy GOTV walkers represents a payment to individuals providing service to the Committee. We contracted with Lincoln Strategy Group, LLC. Lincoln Strategy Group, LLC hires and pays individuals to provide services. We feel we have complied with CFR Sec. 104.9(a) in reporting this disbursement, therefore no amendment to our report is required. We have no right or access to the individual employment records of Lincoln Strategy Group, LLC.

16. We amended our report to indicate that itemization is not necessary pursuant to 11 CFR Sec. 300.36(b) as all amounts were less than \$200.00 for the calendar year per vendor.

17. We have amended our report to reflect the vendor and address for the payment of \$947.59 for bus travel as requested.

18. We amended our report to indicate that itemization is not necessary pursuant to 11 CFR Sec. 300.36(b) as all amounts were less than \$200.00 for the calendar year per vendor.

I assume this completes all matters relative to the report period in question. However, should you have any follow up questions, please do not hesitate to contact us.

Sincerely,

Paul Hoag
Treasurer

cc: Jason Mauk
Audit File
Sec2/ORP/FEC 3-11-09-Amended 30 Day Post General
